

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANDREW HILLMAN, *et al.*,

Plaintiffs,

v.

RINGLEADER DIGITAL, INC., *et al.*,

Defendants.

Civil Action No. 1:10-cv-08315-JGK

**PLAINTIFFS' NOTICE OF MOTION
FOR APPROVAL OF CLASS ACTION
SETTLEMENT**

NOTICE OF MOTION

NOTICE IS HEREBY GIVEN that, on March 14, 2011, at 9:00 a.m. or as soon thereafter as counsel may be heard, before the Honorable John G. Koeltl, United States District Judge, in Courtroom 12B of the United States Courthouse located at 500 Pearl Street, New York, New York 10007, Plaintiffs will move this Court to grant approval of a proposed settlement in this consumer class action pursuant to Federal Rule of Civil Procedure 23(e).

Plaintiffs seek approval of the proposed class action settlement as fair, reasonable, and adequate. Plaintiffs' unopposed motion is based on this Notice of Motion, the accompanying Brief in Support of Motion for Approval of Class Action Settlement and authorities cited therein, the Declaration of David A. Stampley and exhibits attached thereto, oral argument of counsel, and any other matters submitted at the hearing or otherwise brought before the Court.

Dated: February 22, 2011

Respectfully submitted,
KamberLaw, LLC

s/David A. Stampley

By: David A. Stampley
100 Wall Street, 23rd Floor
New York, New York 10005
Telephone: (212) 920-3072
Facsimile: (212) 920-3081
dstampley@kamberlaw.com